

Dicamba and Acifluorfen Intermediates - Comments of Environmental Defense

(Submitted via Internet 6/14/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Dicamba and Acifluorfen Intermediates.

The test plan for dicamba and acifluorfen intermediates submitted by BASF proposes to establish three separate subcategories representing 9 HPV chemicals and three structural analogs of those HPV chemicals. Overall, we found the test plan to be objective and well-written and we support its conclusions. However, we do have one concern regarding the lack of information on how the individual chemicals are used either as intermediates and/or in consumer products. Although this kind of information is not explicitly required by the HPV program, it does enable an evaluation of worker safety concerns, potential for environmental releases and the opportunity for human exposure.

Accordingly, we recommend that the sponsor make available any information directly relevant to the above issues. For example, are there any data on environmental releases and contamination and any monitoring data assessing human exposure? Also, what industrial hygiene practices are in place to prevent or minimize worker exposure?

The following specific comments are, in general, supportive of the test plan. In essence, there are three separate test plans as each of the three subgroups are structurally distinct from each other. For convenience, BASF and EPA might want to consider dividing the plan in this way although such a division would have no impact on the proposed studies.

1. Establishment of the Group 1 subcategory is clearly justified. Dicamba is the representative chemical for this group and adequate data already exist for all endpoints. The other three chemicals in this subgroup are structurally similar and would be expected to possess similar toxicological properties. The sponsor points out that dicamba and its sodium salt would be slightly less biodegradable in the environment and the human body because they contain a methoxy group and the others do not. Therefore, the other two chemicals in this subgroup would probably be slightly less toxic than dicamba although the patterns of toxicity should be similar. This information coupled with the very informative section on metabolism are compelling reasons to use dicamba as the representative chemical for this subgroup.

2. Subgroup 2 chemicals include 2,5-dichlorophenol and 2,5-dichloroanisole as the representative chemicals. The test plan notes data gaps for environmental fate and ecotoxicity as well as for mammalian reproductive and developmental toxicity. The sponsor proposes to fill these gaps using 2,5-dichloroanisole as the test substance. This is a good choice because 2,5-dichloroanisole would be expected to be more biologically persistent than the other three members of the subgroup, although the patterns of toxicity should be similar.

3. Subgroup 3 uses Acifluorfen and CAS number 63734-62-3 as the representative chemicals. Adequate data already exist for all endpoints within this group, with the possible exception of biodegradability, for which the data were deemed questionable. For this reason, the sponsor proposes to conduct a biodegradability study on Acifluorfen and we support this proposal.

Thank you for this opportunity to comment.

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